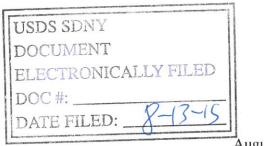
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August 13, 2015

By ECF and Email

The Honorable Richard J. Sullivan
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square, New York, NY 10007
Email: sullivanNYSDchambers@nysd.uscourts.gov

MEWO ENDORSED

Re: Liu v. The New York City Campaign Finance Board, No. 14-cv-01687

Dear Judge Sullivan:

Pursuant to the Court's order of June 30, 2015 (Dkt. 48), the parties in the above-captioned action hereby submit this joint letter updating the Court on the status of the Campaign Finance Board's ("CFB") proposed rule changes and the status of this litigation.

Today, the CFB met and formally adopted the proposed rules that it had noticed earlier this summer. (The Notice was attached as Exhibit A to Plaintiffs' June 30, 2015 letter. Dkt. 47.) The rule changes will be published in the City Record within five business days; they become effective 30 days later (on or about September 21, 2015).

Defendants have informed Plaintiffs that they intend to file a motion to dismiss as moot the remainder of Plaintiffs' claims. Plaintiffs will oppose Defendants' motion. We write today to seek approval of a proposed briefing schedule on the motion. Defendants propose submitting their opening brief in support of the motion by October 2, 2015; Plaintiffs propose submitting their opposition brief on November 3, 2015; and Defendants will submit their reply brief on November 24, 2015.

With this briefing schedule in place, the parties agree that any discovery would remain stayed pending the determination of the motion.

SO ORDERED
Dated: 8 / 13 / 13 U.S.D.J.

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Respectfully submitted,

<u>/s/</u>

Richard D. Emery Alison Frick David A. Lebowitz

c. Corporation Counsel (via ECF)